Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In Re: Delete, Delete, Delete	)	GN Docket 25-133
	)	
	)	DA 25-219

COMMENTS OF
T Z SAWYER TECHNICAL CONSULTANTS

I. INTRODUCTION AND BACKGROUND

The technical consulting firm of T Z Sawyer Technical Consultants ("TZSTC") led by its principal Timothy Z. Sawyer, has been providing engineering and technical services to the telecommunications and broadcast industries, including AM, FM, and Television Broadcast facilities for nearly 50 years.

TZSTC supports the streamlining or deletion of many of the outdated legal and technical rules within CFR Title 47 to enhance regulatory efficiency. TZSTC limits its own comments to three technical rules that are obsolete, no longer serve their intended purpose, or hinder optimal use of the broadcast spectrum.

II. DELETION OF THE REQUIREMENT OF CERTAIN FM TRANSLATORS TO RETRANSMIT THE PRIMARY STATION SIGNAL BY DIRECT OVER-THE-AIR RECEPTION

47 C.F.R. §74.1231(b) of the Commission's Rules should be revised to permit flexibility and efficiency by allowing all FM translators regardless of purpose, or ownership, within

the primary service area, or beyond the primary service area of the primary station to receive programming by any alternative signal delivery means necessary, including, but not limited to, direct reception, satellite, internet, and terrestrial microwave facilities. 47 C.F.R. §74.1231(b)(1) and 47 C.F.R. §74.1231(b)(2) are rendered no longer relevant by the changes above and may be deleted.

III. DELETION OF THE MINIMUM ANTENNA INPUT POWER IN KILOWATTS REQUIRED FOR AM STATIONS

47 C.F.R. § 73.21 Classes of AM broadcast channels and stations list four Classes of AM broadcast stations by antenna input values in kilowatts. The antenna RMS values and antenna input power exceptions should correspond to those values listed in 47 C.F.R. § 73.182.

Where necessary and appropriate minimum antenna input power should be disregarded as long as minimum antenna RMS values are achieved without rigid power mandates.

IV. DELETION OF THE PROTECTION TO SECOND AND THIRD ADJACENT CHANNEL FM STATIONS AS CURRENT APPLIED

Protections for second and third-adjacent full-service FM stations under current rules should be revised to allow applicants to demonstrate that no harmful interference will occur to populated areas, consistent with the flexibility afforded to FM translators. Relying solely on predicted contour overlap to deny applications is not in the public interest when no actual harm to listeners would result. For example, if overlapping

contours fall over unpopulated areas—such as wilderness, bodies of water, or mountaintops—no interference to the public occurs. Techniques like downward radiation suppression, widely used for FM translators, should be extended to full-service FM stations to facilitate signal improvements without compromising listener access.

SUMMARY

TZSTC proposes the following changes to enhance broadcast spectrum efficiency and regulatory deletions:

1. Eliminate FM translator program delivery restrictions to allow all translators to use alternative delivery methods.
2. Remove references to AM antenna input power in kilowatts, relying instead on minimum RMS values for each station Class where feasible.
3. Permit full-service FM stations to demonstrate no harmful interference to second or third-adjacent stations in unpopulated areas, consistent with FM translator rules.

Respectfully submitted,

T Z SAWYER TECHNICAL CONSULTANTS

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